

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products  
Liability Litigation

No. MDL 15-02641-PHX-DGC

**QUALIFIED PROTECTIVE ORDER**

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Pending before the Court is the parties' joint motion for Qualified Protective Order. Doc. 21772. The parties' joint motion for Qualified Protective Order (Doc. 21772) is **granted**. The individuals listed on attached Exhibit A have asserted claims against defendants in the above captioned action. These individuals have retained Counsel to represent them in relation to the above-captioned action. Counsel agrees that they represent the individuals identified in Exhibit A.

**IT IS HEREBY ORDERED AS FOLLOWS:**

1. By virtue of their status as Counsel for the individuals listed on Exhibit A, Counsel shall resolve any potential Part A and/or Part B fee-for-service Medicare Secondary Payer (MSP) claim(s) related to settlements, judgments, awards, or other payments associated with the above captioned action for those individuals on Exhibit A who are or were Medicare beneficiaries.
2. Counsel has also retained ARCHER Systems, LLC ("ARCHER") to identify and resolve potential healthcare liens with Medicaid agencies, TRICARE, Veteran's

Administration, Department of Defense, Indian Health Services, and private health insurers, (hereinafter, collectively “the Agencies”) claim(s) related to settlements, judgments, awards, or other payments associated with the above captioned action for those individuals on Exhibit A who are or were beneficiaries of the Agencies.

3. The entry of this HIPAA-compliant qualified protective order is necessary in this action in order to permit the Agencies to transmit lists of information, including protected health information and other related information regarding the individuals listed on Exhibit A to ARCHER, rather than providing copies of individual HIPAA authorizations and information on a claimant-by-claimant basis, including any third party authorized by ARCHER or the Court to assist in the resolution of the Agencies’ potential liens and reimbursement claims.
4. As such, it is hereby ordered:
  - a. This Qualified Protective Order shall apply to all “protected health information” and “individually identifiable health information,” as defined by 45 CFR § 160.103, or information that is otherwise protected from disclosure by the Privacy Act, 5 U.S.C. § 551a, the Health Insurance Portability and Accountability Act of 1996, Pub. L. 104-191, 42 CFR § 431 Subpart F, titled “Safeguarding Information on Applicants and Recipients” and other applicable state law, created, received or collected from plaintiffs and claimants by the Agencies, including, but not limited to: (a) names and addresses, dates of birth, social security numbers, identification numbers and

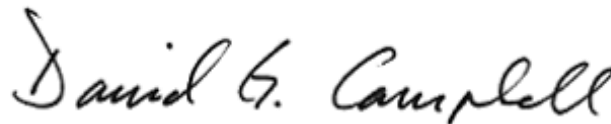
other demographic information that identifies, or could be used to identify the individuals listed on Exhibit A; (b) eligibility and entitlement information for the individuals listed on Exhibit A; (c) claims information relating to the past, present, or future health care of the individuals listed on Exhibit A; (d) claims information relating to the provision of healthcare to the individuals listed on Exhibit A; and, (e) claims information relating to the past, present, or future payment for the provision of healthcare to the individuals listed on Exhibit A.

- b. Each Agency is hereby authorized and directed to transmit to ARCHER to assist in the resolution of potential liens or reimbursement claims, any information, including claims information and other protected health information, for those individuals listed on Exhibit A against whom they may assert liens or reimbursement claims.
- c. ARCHER shall not use or disclose any protected health information or individually identifiable health information subject to this Qualified Protective Order for any purpose other than this litigation, including compliance with any applicable Court orders or other legal obligations. Similarly, the Agencies shall only use the information listed on Exhibit A for the specific purposes of transmitting to ARCHER any information, including claims information and other protected health information, for those individuals listed on Exhibit A in the above-captioned matter against whom

the Agencies have asserted liens or reimbursement claims, or in whose potential settlements the Agencies may have an interest. The Agencies shall only make the information for the individuals listed on Exhibit A available to those within their respective Agency who need access to the information for the individuals listed on Exhibit A for the specific purpose stated in this paragraph. If the Agency utilizes outside vendors or companies to perform part or all of their tort recovery practices, the outside vendors or companies shall be expressly bound by all terms and conditions of this Qualified Protective Order.

- d. ARCHER shall maintain any protected health information or individually identifiable health information subject to this Qualified Protective Order in a secure and safe area and shall exercise the same standard of due and proper care with respect to the storage, custody, use and/or dissemination of such protected health information as is exercised by ARCHER with respect to its own confidential proprietary information.

Dated this 25th day of January, 2021.

A handwritten signature in black ink, reading "David G. Campbell". The signature is written in a cursive, flowing style. Below the signature is a horizontal line.

David G. Campbell  
Senior United States District Judge

**EXHIBIT A**

<b>Docket</b>	<b>Last Name</b>	<b>First Name</b>
No. CV18-01819-PHX DGC	Abla	Steve
No. CV17-02184-PHX DGC	Adkins	Robert
No. CV16-04099-PHX DGC	Adolphson	James
No. CV19-03786-PHX DGC	Albert	Steven
No. CV17-03562-PHX DGC	Alejandro	Guadalupe
No. CV16-02193-PHX DGC	Allemand	Nancy
No. CV17-02601-PHX DGC	Allen	Gary
No. CV16-03439-PHX DGC	Allshouse	Deborah
No. CV19-00703-PHX DGC	Anderson	Jean
No. CV18-00457-PHX DGC	Angiolillo	Laura
No. CV16-04105-PHX DGC	Anguin	Christina
No. CV17-00491-PHX DGC	Arcos	Janie
No. CV18-02592-PHX DGC	Atkins	Clifton
No. CV18-04660-PHX DGC	Barcomb	Susan
No. CV16-04129-PHX DGC	Bates	Frances
No. CV16-04130-PHX DGC	Beady	Brett
No. CV19-03355-PHX DGC	Bell	Courtney
No. CV17-04530-PHX DGC	Bethke	Fonda
No. CV19-03575-PHX DGC	Blair	Todd
No. CV16-04135-PHX DGC	Blankenship	William
No. CV16-04137-PHX DGC	Boncoraglio	George
No. CV16-04148-PHX DGC	Bradford	Anthony
No. CV19-03572-PHX DGC	Briggs	Martha
No. CV18-03170-PHX DGC	Britt	Stephanie
No. CV18-00455-PHX DGC	Britton	Lynda
No. CV16-02191-PHX DGC	Brown	Linda
No. CV17-02981-PHX DGC	Brown	Matthew
No. CV17-04077-PHX DGC	Bryant	Ron
No. CV17-03563-PHX DGC	Buis	John
No. CV19-03356-PHX DGC	Calandra	John
No. CV17-03564-PHX DGC	Carrillo	Dora
No. CV17-02984-PHX DGC	Carroll	Alford
No. CV16-03126-PHX DGC	Carroll	Charles
No. CV16-04149-PHX DGC	Carter	Robert
No. CV17-03565-PHX DGC	Casci	Kathleen
No. CV19-03787-PHX DGC	Cervantes	Luis
No. CV17-02602 -PHX DGC	Chandler	Ellen
No. CV18-03831-PHX DGC	Cheney	Howard

No. CV17-02980-PHX DGC	Chitty	Sabrina
No. CV18-00019-PHX DGC	Chuculate	Eric
No. CV16-04150-PHX DGC	Clark	Patricia
No. CV16-02190-PHX DGC	Coleman	Stephanie
No. CV19-00705-PHX DGC	Collins	Artrick
No. CV17-03566-PHX DGC	Conley	Barbara
No. CV19-03350-PHX DGC	Contos	Frank
No. CV16-04153-PHX DGC	Crabtree	Eleanor
No. CV18-00454-PHX DGC	Crawford	Erica
No. CV19-03576-PHX DGC	Cristallo	Doreen
No. CV18-03167-PHX DGC	Crocker	Terrance
No. CV18-00785-PHX DGC	Crump	Wanda
No. CV19-04090-PHX DGC	Cueford	Samuel
No. CV16-03127-PHX DGC	Cummings	Timothy
No. CV17-02408-PHX DGC	Curtis	Colleen
No. CV16-02196-PHX DGC	D'Antonio	Michael
No. CV18-04659-PHX DGC	Davis	Donald
No. CV19-04107-PHX DGC	Davis	Elke
No. CV17-03567-PHX DGC	Dean	Tim
No. CV16-04199-PHX DGC	Deck	Valli
No. CV19-03357-PHX DGC	DeMaio	Gabriel
No. CV17-04074-PHX DGC	Demuth-Kresser	Cheryl
No. CV16-04155-PHX DGC	Dinkle	Velma
No. CV17-00492-PHX DGC	Dion	Sharon
No. CV17-04073-PHX DGC	DiPatri-LoFaro	Christey
No. CV19-03358-PHX DGC	Donna	Marie
No. CV18-00779-PHX DGC	Donohoe	Melinda
No. CV18-02993-PHX DGC	Douglas	Dennis
No. CV18-00020-PHX DGC	Duffala	Dale
No. CV18-00387-PHX DGC	Early	Michael
No. CV16-04169-PHX DGC	Emery	Patricia
No. CV19-00707-PHX DGC	Erickson	Kevin
No. CV18-02992-PHX DGC	Faulkner	Tiffiney
No. CV18-00124-PHX DGC	Fitch	John
No. CV17-03568-PHX DGC	Fitzpatrick	William
No. CV17-01551-PHX DGC	Franks	Kimberly
No. CV17-04072-PHX DGC	Fuentes-Parrish	DeirDrea
No. CV18-01820-PHX DGC	Funderburk	Barbara
No. CV16-04171-PHX DGC	Ganschow	Lois
No. CV16-04417-PHX DGC	Garvin	Zachary
No. CV16-03987-PHX DGC	George	Barbara

No. CV19-03578-PHX DGC	Gerhart	Stephen
No. CV19-03351-PHX DGC	Godfrey	James
No. CV18-03168-PHX DGC	Gordon	Lester
No. CV16-04187-PHX DGC	Goshert	Jesse
No. CV17-02986-PHX DGC	Green	Jimmy
No. CV19-03581-PHX DGC	Greene	David
No. CV18-02002-PHX DGC	Greenleaf	Kevin
No. CV17-02983-PHX DGC	Grzeca	John
No. CV19-03590-PHX DGC	Guy	Anthony
No. CV19-03349-PHX DGC	Hamilton	Rick
No. CV17-04076-PHX DGC	Hamm	Jonathan
No. CV19-03788-PHX DGC	Hamp	Syreeta
No. CV16-04202-PHX DGC	Hampton	Christopher
No. CV18-01197-PHX DGC	Harpster	Elizabeth
No. CV18-00123-PHX DGC	Harris	Kristy
No. CV19-03789-PHX DGC	Hartt	George
No. CV16-04203-PHX DGC	Haynes	Jonathan
No. CV19-03790-PHX DGC	Henley	Jacob
No. CV17-02985-PHX DGC	Henson	Kathleen
No. CV17-02410-PHX DGC	Herring	Bonnie
No. CV17-02603-PHX DGC	Hess	Donna
No. CV16-04215-PHX DGC	Hill	Charles
No. CV19-03791-PHX DGC	Holcomb	Tamara
No. CV17-02411-PHX DGC	Honaker	Larry
No. CV16-02199-PHX DGC	Hoover	Carla
No. CV17-03570-PHX DGC	Hostettler	David
No. CV18-01041-PHX DGC	Howard	Henry
No. CV17-02413-PHX DGC	Howell	Pamla
No. CV18-00687-PHX DGC	Hoyopatubbi	Deborah
No. CV18-01821-PHX DGC	Hubler	Frances
No. CV18-04655-PHX DGC	Hughes	Pearlie
No. CV17-00494-PHX DGC	Hull	Kathryn
No. CV16-02197-PHX DGC	Hunt	Carl
No. CV17-00972-PHX DGC	Hunt	Barbara
No. CV16-04308-PHX DGC	Hurt	Brenda
No. CV19-03792-PHX DGC	Ireland	James
No. CV17-03571-PHX DGC	Jackson	Charles
No. CV18-03832-PHX DGC	Jackson	Edward
No. CV18-00781-PHX DGC	Jacobs	Carla
No. CV17-02604-PHX DGC	Jarred	Scott
No. CV17-02605-PHX DGC	Jimenez	George

No. CV18-02455-PHX DGC	Jimenez	Margaret
No. CV19-00921-PHX DGC	Johnson	Debra
No. CV18-03833-PHX DGC	Johnson	Ryan
No. CV19-01521-PHX DGC	Jones	Denise
No. CV18-01195-PHX DGC	Jones	Jereme
No. CV16-03130-PHX DGC	Jordan	La Kel
No. CV18-03166-PHX DGC	Kiley	Timothy
No. CV18-00125-PHX DGC	King	Tammy
No. CV17-02606-PHX DGC	Kornegay	Mandy
No. CV16-04216-PHX DGC	Lane	John
No. CV18-01818-PHX DGC	Larue	Tim
No. CV18-02994-PHX DGC	Lazaros	Harry
No. CV18-01196-PHX DGC	Lemmons	Derrick
No. CV19-04109-PHX DGC	Lessig	Doris
No. CV19-03352-PHX DGC	Lingrel	Virgil
No. CV17-00493-PHX DGC	Linville	Marjorie
No. CV18-00780-PHX DGC	Little	Vantroy
No. CV16-04218-PHX DGC	Lloyd	Crestest
No. CV18-01898-PHX DGC	Luna	Randle
No. CV18-00460-PHX DGC	Madison	Cargin
No. CV18-02995-PHX DGC	Manning	Gloria
No. CV19-04112-PHX DGC	Martinez	Rosendo
No. CV16-04219-PHX DGC	Martino	Christina
No. CV16-04226-PHX DGC	Marx	Paul
No. CV19-00704-PHX DGC	Mashburn	Barbara
No. CV17-03611-PHX DGC	Masters	Richard
No. CV17-02186-PHX DGC	Mayle	Darlene
No. CV16-04227-PHX DGC	Mays	Michael
No. CV19-03793-PHX DGC	McBride	Jamie
No. CV17-02979-PHX DGC	McCain	Sidney
No. CV19-03354-PHX DGC	McCloskey	Sara
No. CV17-01507-PHX DGC	Melton	LouAnn
No. CV19-03794-PHX DGC	Menzel	David
No. CV16-04241-PHX DGC	Miller	Barbara
No. CV17-02414-PHX DGC	Mitchell	Suzat
No. CV17-02978-PHX DGC	Mockridge	David
No. CV16-04242-PHX DGC	Moseley	Travis
No. CV16-04243-PHX DGC	Nevadomski	Gregory
No. CV17-00814-PHX DGC	Newton	Charles
No. CV19-03359-PHX DGC	Nichols	Leslie
No. CV18-00912-PHX DGC	Nickerson	Nancy



No. CV16-04245-PHX DGC	Orlowski	Michael
No. CV17-02607-PHX DGC	Owens	James
No. CV18-02456-PHX DGC	Paffel	Bridget
No. CV16-04246-PHX DGC	Parmenter	Michael
No. CV18-02591-PHX DGC	Patterson	Benny
No. CV19-00706-PHX DGC	Patterson	Orval
No. CV16-04247-PHX DGC	Pearce	William
No. CV18-00456-PHX DGC	Petty	Matthew
No. CV19-03360-PHX DGC	Pinero	Anibal
No. CV18-03834-PHX DGC	Pitman	Terry
No. CV18-04657-PHX DGC	Powell-Bey	Tenika
No. CV18-02762-PHX DGC	Price	Ella
No. CV17-03573-PHX DGC	Quesenberry	Frank
No. CV16-04259-PHX DGC	Raleigh	Jeffery
No. CV19-03582-PHX DGC	Rasmussen	Stacie
No. CV17-02608-PHX DGC	Reed	Clifford
No. CV18-02996-PHX DGC	Reels	Marla
No. CV19-03353-PHX DGC	Rennick	Jerry
No. CV17-04531-PHX DGC	Richardson	Michelle
No. CV16-04263-PHX DGC	Robinson	Robin
No. CV18-00021-PHX DGC	Romero	Jaime
No. CV16-04276-PHX DGC	Romig	Bobbie
No. CV19-03583-PHX DGC	Rose	Audrey
No. CV17-02183-PHX DGC	Ross	Patrick
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No. CV17-03574-PHX DGC	Rubio	Linda
No. CV19-03795-PHX DGC	Russ	Kenneth
No. CV17-04435-PHX DGC	Sagastume	Jovanna
No. CV18-04658-PHX DGC	Scallions	Brenda
No. CV17-01508-PHX DGC	Scott	James
No. CV19-04114-PHX DGC	Seidler	Warren
No. CV16-04279-PHX DGC	Serres	Gary
No. CV19-03585-PHX DGC	Shackford	David
No. CV16-02865-PHX DGC	Shields	Larry
No. CV19-03586-PHX DGC	Sirin	Milissa
No. CV18-00459-PHX DGC	Sligh	Kimberly
No. CV16-04280-PHX DGC	Smith	Kayla
No. CV19-04097-PHX DGC	Smith	Peggy
No. CV16-04281-PHX DGC	Souza	Paul
No. CV16-04282-PHX DGC	Squitieri	Richard
No. CV18-03835-PHX DGC	Staples	Thomas

No. CV16-03129-PHX DGC	Steinhilber	James
No. CV16-04424-PHX DGC	Steinmuller	Stephany
No. CV16-04292-PHX DGC	Stephens	Patricia
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No. CV18-00777-PHX DGC	Stokes-Harris	Michelle
No. CV18-00126-PHX DGC	Strother	Catherine
No. CV18-03171-PHX DGC	Sweeney	Clayton
No. CV18-00778-PHX DGC	Thompson	Doris
No. CV17-02185-PHX DGC	Tillson	Paul
No. CV17-04071-PHX DGC	Tressler	Gina
No. CV19-04099-PHX DGC	Trujillo	Rosemary
No. CV18-04656-PHX DGC	Wagner	Margaret
No. CV16-04304-PHX DGC	Walker	Nancy
No. CV18-00128-PHX DGC	Waller	Carrie
No. CV17-02609-PHX DGC	Walter	Casey
No. CV16-04310-PHX DGC	Ward	Elton
No. CV17-02610-PHX DGC	Washington	Mark "Mack"
No. CV19-04104-PHX DGC	Wesson	Kim
No. CV18-01897-PHX DGC	Whitaker	Tammy
No. CV18-01899-PHX DGC	Whitley	Gregory
No. CV17-04070-PHX DGC	Wilemon	Wade
No. CV16-00435-PHX DGC	Williams	Kristy
No. CV16-04311-PHX DGC	Williams	Keith
No. CV16-04312-PHX DGC	Wisniach	Rose
No. CV19-03797-PHX DGC	Wood	James
No. CV19-03588-PHX DGC	Wrice	Jerry
No. CV18-01363-PHX DGC	Ybanez	Angel
No. CV18-03172-PHX DGC	Yoho	Heather
No. CV18-03173-PHX DGC	Young	Henry
No. CV18-02454-PHX DGC	Zirbel	Linda